

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

MUFG UNION BANK, N.A. and GLAS
AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

No. 19 Civ. 10023 (KPF)

**[PROPOSED] AMENDMENT TO STIPULATED CONFIDENTIALITY
AGREEMENT AND PROTECTIVE ORDER**

WHEREAS, Plaintiffs and Counterclaim Defendants Petróleos De Venezuela, S.A., PDVSA Petróleo, S.A., and PDV Holding, Inc. and Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. (the “Trustee”) and GLAS Americas LLC (the “Collateral Agent”; collectively, the “Parties”) entered into a Stipulated Confidentiality Agreement and Protective Order (“Protective Order”), which was so-ordered by this Court on February 10, 2020 (ECF No. 53);

WHEREAS, the Protective Order provides for amendment by agreement of the parties and further order of the Court as necessary to allow for the continued protection and use of information subject to any applicable privileges or protections; and

WHEREAS, the Parties, through counsel, wish to amend the Protective Order to protect confidential information that may be disclosed in connection with the Trustee and Collateral Agent’s motion for entry of a judgment and for fees and expenses (the “Fee Application”);

IT IS HEREBY STIPULATED AND AGREED that all materials filed or served in connection with the Fee Application (including any further submissions in opposition or in support) shall be deemed “Discovery Materials” for all purposes under the Protective Order. Accordingly, and without limiting the foregoing, such materials may be designated Confidential or Attorneys’ Eyes Only in accordance with the Protective Order.

Dated: New York, New York
November 23, 2020

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

By: s/ Jonathan H. Hurwitz
Walter Rieman
William A. Clareman
Roberto J. Gonzalez
Jonathan H. Hurwitz
Shane D. Avidan
Zachary B. Kaye

1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: 212-373-3000
wrieman@paulweiss.com
wclareman@paulweiss.com
jhurwitz@paulweiss.com
savidan@paulweiss.com
zkaye@paulweiss.com

2001 K Street, NW
Washington, DC 20006-1047
Telephone: 202-223-7300
rgonzalez@paulweiss.com

LATHAM & WATKINS LLP

By: s/Christopher J. Clark
Christopher J. Clark
Matthew S. Salerno
Sean H. McMahon

885 Third Avenue
New York, New York 10022
Telephone: 212-906-1200
chris.clark@lw.com
matthew.salerno@lw.com
sean.mcmahon@lw.com

Attorneys for Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. and GLAS Americas LLC, in their respective capacities as Trustee and Collateral Agent, under the Indenture dated October 27, 2016, and the Pledge and Security Agreement dated October 28, 2016, governing PDVSA’s Senior Secured Notes due 2020

PAUL HASTINGS LLP

By: /s Kurt W. Hansson
Kurt W. Hansson
James R. Bliss
James B. Worthington

200 Park Avenue
New York, New York 10166
(212) 318-6000
kurthansson@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com

*Attorneys for Plaintiffs and Counterclaim
Defendants Petr leos de Venezuela, S.A. and
PDVSA Petr leo, S.A.*

WILLKIE FARR & GALLAGHER LLP

By: /s Tariq Mundiya
Tariq Mundiya
Jeffrey B. Korn
Michael J. Gottlieb

787 Seventh Avenue
New York, New York 10019
(212) 728-8000
tmundiya@willkie.com
jkorn@willkie.com

1875 K Street NW
Washington DC 20006
(202) 303-1442
mgottlieb@willkie.com

*Attorneys for Plaintiff and Counterclaim
Defendant PDV Holding, Inc.*

SO ORDERED:

KATHERINE POLK FAILLA
United States District Judge

Dated: New York, New York

November __, 2020